

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

THE SHORE FIRM LLP,

Petitioner,

v.

VIDEOSHARE, LLC,

Respondent

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Civil Action no. _____

PETITION TO CONFIRM ARBITRATION AWARD

Pursuant to the Federal Arbitration Act, 9 U.S.C § 9, and the Parties’ Attorney Retainer Agreement (“ARA”)¹, Petitioner requests confirmation of an arbitration award issued on April 23, 2024 (the “Award”)². The Award was the result of Judicial Arbitration and Mediation Services Case No. 5310000467, *The Shore Firm LLP v. VideoShare, LLC, v. Michael Shore* (the “Arbitration”).

I. PARTIES

2. The Shore Firm LLP is a Texas entity with its principal place of business at 901 Main Street, Suite 3300, Dallas, Texas 75702.

3. VideoShare, LLC, is a Texas limited liability company with a principal place of business at 605 Austin Avenue, Suite 103, Waco, Texas 76701. VideoShare can be served through its registered agent, Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware 19801.

¹ A true and correct copy of the ARA is filed under seal as Exhibit 1.

² A true and correct copy of the Amended/Corrected Final Award entered by Judge Harlan Martin (ret.) is filed under seal as Exhibit 2.

II. JURISDICTION AND VENUE

4. This Court has jurisdiction to confirm the Award at issue pursuant to the ARA and the Federal Arbitration Act (“FAA”).

5. Venue is proper in this district pursuant to 9 U.S.C. § 9 and the ARA’s venue selection clause.

III. CONFIRMATION OF AWARD BY ENTRY OF JUDGMENT

6. The FAA states, in relevant part:

If the parties in their agreement have agreed that a judgment of the court shall be entered upon the award made pursuant to the arbitration, and shall specify the court, then at any time within one year after the award is made any party to the arbitration may apply to the court so specified for an order confirming the award, and thereupon the court must grant such an order unless the award is vacated, modified, or corrected as prescribed in sections 10 and 11 of this title. If no court is specified in the agreement of the parties, then such application may be made to the United States court in and for the district within which such award was made.

9 U.S.C. § 9. This case meets all of the requirements for confirmation.

7. The ARA authorizes judgment to be entered upon any arbitration award:

This arbitration shall be administered by JAMS pursuant to its comprehensive arbitration rules and procedures and in accordance with the expedited procedures in those rules. Judgement on the Award may be entered in federal court in Dallas, Texas.³

8. Petitioner makes this application within one year of the Award’s entry.

9. None of the circumstances described in FAA §§ 10 or 11 exist. All requirements for the Award confirmation are met. Petitioner seeks confirmation of the Award and a judgment in conformity with it against VideoShare.

³ Exhibit 1, at § 8(b).

PRAYER

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully requests judgment as follows:

1. A declaration confirming the Final Award to The Shore Firm LLP;
2. A Judgment against VIDEOSHARE, LLC, in the amount of \$1,016,855.25;
3. Post-Award interest at the statutory rate of 8.5% compounded annually until the Award is fully paid⁴ yielding per diem interest of \$236.80; and
4. Costs and attorneys' fees incurred by the Petitioner.

Dated: April 26, 2024

Respectfully submitted,

By: /s/ Michael W. Shore
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ATTORNEYS FOR PETITIONER
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⁴ Application of Tex. Fin. Code, Chapter 304 calls for post-Award interest at the rate of 8.5% compounded annually. The interest accrues from April 23, 2024 pursuant to the Award.